5

15

20

25

## REMARKS/ARGUMENTS

The Examiner is thanked for the thorough examination and for finding previously-presented Claims 179-208 allowable

Claims 163-208 are pending; Claims 1-162 are canceled.

Response to Claim Rejections under 35 U.S.C. 102 and 103

Applicants respectfully traverse the rejections for at least the reasons set forth below.

## Response to Claims 163-178

As previously presented, independent claim 163 is recited below:

163. A chip package comprising:

a substrate comprising silicon;

a die joined with said substrate; and

a metallization structure over said die, wherein said metallization structure comprises an electroplated metal.

Reconsideration of Claim 163-178 rejected under 35 U.S.C. 102(e) as being anticipated by Eichelberger et al. (US 6,396,148) is requested based on the following remarks.

Applicants respectfully assert that the chip package claimed in Claim 163 patentably distinguishes over the citation by Eichelberger et al. (US 6,396,148).

Eichelberger et al. teach a chip package comprising a substrate 101, a die 102 joined with said substrate 101, and a metallization structure 108 over said die 102. ~ See FIG. 1 and col. 4, lines 9-22 ~

However, Eichelberger et al. fail to teach, hint or suggest that said metallization structure 108 may comprise an electroplated metal.

The Examiner considers that "electroless metal and electroplated metal are synonymous". — See the first paragraph, on page 6, in the Final Office Action mailed Jan. 4, 2007 ~

Applicants respectfully traverse the Examiner's opinion. "Electroless" means "being or involving deposition of metal by chemical means instead of by electrodeposition". — Extracted from Merriam-Webster's Online Dictionary, 10th Edition — "Electroplate" means "to plate with an adherent continuous coating by electrodeposition". — Extracted from Merriam-Webster's Online Dictionary, 10th Edition — The meanings of "electroless" and "electroplate" are significantly different from each other. It is believed that "electroless metal" is non-analogous to "electroplated metal".

20

25

15

10

The Examiner considers that "Applicant argues the difference between the two words, "electroless" and "electroplate", specifying that electroplating means, "to plate with an adherent continuous coating by electrodeposition." However, this difference is not spelled out in the claims". ~ See lines 2 and 3, on page 2, in the Advisory Action mailed April 9, 2007 ~

Applicants respectfully traverse the Examiner's opinion because the limitation that "said metallization structure comprises an electroplated metal" was spelled out in lines 4 and 5 of Claim 163.

Eichelberger et al. teach that "Electroless metal means that the metal has been deposited by a chemical process in which there is no external electrical current". ~ See col. 4, line 67 through col. 5, line 2 ~ The definition of "electroless metal" by Eichelberger et al. is significantly different from "electroplated metal" that is formed through an external electrical current.

The Examiner considers that "Eichelberger provides more than enough teaching to one skilled in the art at the time of the invention that the metal deposited was electroplated metal, even if Eichelberger did not use those words exactly." ~ See lines 6-8, on page 2, in the Advisory Action mailed April 9, 2007 ~

Applicants respectfully traverse the Examiner's opinion. Eichelberger et al. do not provide enough teaching to one skilled in the art at the time of the invention that the metal deposited could be electroplated metal because "electroplated metal" is significantly different from "electroless metal".

Withdrawal of the rejection under 35 U.S.C. 103(e) to Claim 163 is respectfully requested.

20

10

15

For at least the foregoing reasons, applicants respectfully submit independent claim 163 patently distinguishes over the prior art references, and should be allowed. For at least the same reasons, dependent claims 164-178 patently define over the prior art as well.

25

## CONCLUSION

Some or all of the pending claims are believed to be in condition for allowance. Accordingly, allowance of the claims and the application as a whole are respectfully requested.

Sincerely yours,

1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1		
Wunder tall	Date: 04.20.2007	

Winston Hsu, Patent Agent No. 41,526

P.O. BOX 506, Merrifield, VA 22116, U.S.A.

Voice Mail: 302-729-1562 Facsimile: 806-498-6673

e-mail: winstonhsu@naipo.com

10

Note: Please leave a message in my voice mail if you need to talk to me. (The time in D.C. is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan.)

15